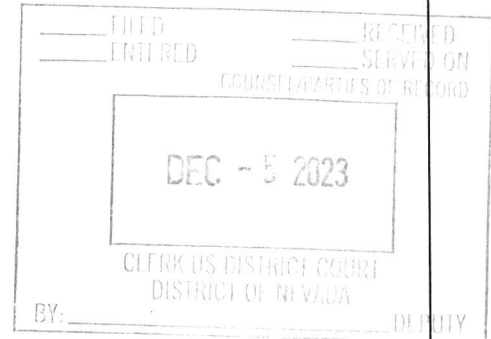


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8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 CELSO DANIEL RUIZ,

14 Defendant.

CRIMINAL INDICTMENT

Case No. 2:23-cr-228-RFB-NJK

VIOLATIONS:

Count One:

18 U.S.C. §§ 922(a)(1)(A), 923(a) and  
924(a)(1)(D) – Engaging in the Business of  
Dealing and Manufacturing Firearms  
Without a License

Counts Two – Ninety-Eight:

18 U.S.C. §§ 922(a)(6) and 924(a)(2) –  
False Statement in Acquisition of Firearm

18 THE GRAND JURY CHARGES THAT:

19 COUNT ONE

20 Engaging in the Business of Dealing or Manufacturing Firearms Without a License  
(18 U.S.C. §§ 922(a)(1)(A), 923(a) and 924(a)(1)(D))

21 Beginning from a time unknown but no later than on or about December 1, 2020,  
22 and continuing to or about January 17, 2023, in the State and Federal District of Nevada,  
23

CELSO DANIEL RUIZ,

defendant herein, not being a licensed dealer, importer, or manufacturer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms all in violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).

**COUNTS TWO THROUGH NINETY-EIGHT**

*False Statement in Acquisition of Firearm*  
(18 U.S.C. §§ 922(a)(6), 924(a)(2))

On or about the dates below, in the State and Federal District of Nevada,

**CELSO DANIEL RUIZ,**

defendant herein, in connection with the acquisition of firearms, as described below, from licensed dealers of firearms within the meaning of Chapter 44, Title 18, United States Code (the "Dealers"), knowingly made a false and fictitious written statement to each of the Dealers, which statement was intended and likely to deceive each of the Dealers, as to a fact material to the lawfulness of each such sale of the said firearm to the defendant under chapter 44 of Title 18, in that for Counts 2-98, the defendant did complete and execute a Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 Firearms Transaction Record, wherein the defendant represented he was the actual transferee/buyer of the firearms listed on the form, when in fact, and as the defendant well knew, he was not the actual transferee/buyer of the firearms and was acquiring the firearms on behalf of another person and/or for sale to a third party:

COUNT	DATE	DEALER (federal firearm licensee)	FIREARM
2	12/18/2020	Ventura Munitions	Ruger, AR-556, 5.56, rifle, SN: 858-13785
3	02/27/2021	Spartan Arms	Taurus, TX22, .22, pistol, SN: 1PT378540
4	02/27/2021	Ventura Munitions	Beretta, 92A1, 9, pistol, SN: A254856Z

5	03/03/2021	Ventura Munitions	1. Arsenal, SAM7-SF, 7.62, rifle, SN: BC603435 2. CZ, P-07, 9, pistol, SN: F001500
6	03/12/2021	C-A-L Ranch Stores	Henry, H004, .22, rifle, SN: GB736389
7	06/17/2021	C-A-L Ranch Stores	ATI Omni Pistol, SN: N5309505
8	07/02/2021	Big 5	Ruger, American, 5.56, rifle, SN: 690470680
9	07/13/2021	C-A-L Ranch Stores	1. Rock Island, 1911 A 680, .380, pistol, SN: RIA2347585 2. Ruger 10/22, .22, rifle, SN: 0017-89768
10	08/09/2021	C-A-L Ranch Stores	1. Ruger, Wrangler, .22, revolver, SN: 204-90026 2. Beretta, 21A Bobcat, .22, pistol, SN: DAA605462
11	08/10/2021	Sportsman's Warehouse	1. Walther, Colt Govt Model, .22, pistol, SN: WD064715 2. Browning, Buckmark, .22, pistol, SN: BRUS28444YM515
12	08/10/2021	Sportsman's Warehouse	1. Umarex, Beretta M9, .22, pistol, SN: BM042565
13	08/12/2021	Bass Pro Shop	1. Browning, Buckmark, .22, pistol, SN: BRUS11140YZ515 2. Walther, P22, .22, pistol, SN: WA326172
14	08/12/2021	Bass Pro Shop	1. Browning 1911, .22 pistol, SN: 51EYY01867 2. Glock 44, .22 pistol, SN: AGYA577
15	08/19/2021	C-A-L Ranch Stores	1. Taurus, TX22, .22, pistol, SN: 1PT411129 2. Taurus, Spectrum, .380, pistol, SN: 1J011560
16	08/28/2021	Sportsman's Warehouse	1. S&W, M&P 380 Shield EZ, .380, pistol, SN: NKN0714 2. Taurus, Spectrum, .380, pistol, SN: 1J000497



17	09/10/2021	Sportsman's Warehouse	Glock, 19 Gen 5, 9, pistol, SN: BUBR912
18	09/27/2021	Sportsman's Warehouse	1. Girsan, Regard MC, 9, pistol, SN: T6368-21A10386  2. S&W, M&P 380 Shield, .380, pistol, SN: REP3788  3. S&W, M&P 380 Shield, .380, pistol, SN: REP5966
19	11/03/2021	C-A-L Ranch Stores	Palmetto State Armory, PA-15, Multi, receiver, SN: SCD415655
20	11/14/2021	C-A-L Ranch Stores	1. Ruger, SR-22, .22, pistol, SN: 369-23108  2. Umarex, Beretta 92FSR, .22, pistol, SN: BM044186  3. S&W, M&P 22, .22, pistol, SN: HJP27US 4. ISSC, MK22, .22, rifle, SN: L266215
21	12/04/2021	C-A-L Ranch Stores	Palmetto State Armory, Dagger, 9, pistol, SN: FG037073
22	12/11/2021	Sportsman's Warehouse	Browning, X-Bolt, 6.5 Creedmoore, rifle, SN: BRJP11547YZ354
23	01/02/2022	Sportsman's Warehouse	1. Browning, Buckmark, .22, SN: BRUS08507YZ515
24	01/02/2022	C-A-L Ranch Stores	1. Palmetto State Armory, Dagger Comp, 9, pistol, SN: FG040552  2. Springfield, Saint Victor, .308, rifle, SN: ST375878
25	01/03/2022	Sportsman's Warehouse #187 Henderson	1. German Sports Guns, Firefly, .22, pistol, SN: F476391
26	01/03/2022	Sportsman's Warehouse #222 Las Vegas	1. S&W, SW22 Victory, .22, pistol, SN: UEN0995
27	01/06/2022	Sportsman's Warehouse #187 Henderson	1. Tikka/Beretta, T3X, 6.5 Creedmoore, rifle, SN: AA1768

28	01/07/2022	American Shooters	1. Keltec, PMR-30, .22, pistol, SN: WHU63 2. Walther, P22 CA, .22, pistol, SN: WA339837
29	01/07/2022	Precision Armory	1. Glock, 44, .22, pistol, SN: AFTM931 2. Ruger, 10/22, .22, rifle, SN: 0017-52372
30	01/07/2022	Discount Firearms & Ammo	1. Walther, P22, .22, pistol, SN: WA327306 2. Bersa, Thunder 22, .22, pistol, SN: L36603
31	01/07/2022	C-A-L Ranch Stores	Keltec, PMR 30, .22, pistol, SN: WY9904
32	01/22/2022	American Shooters	Glock, 44, .22, pistol, SN: AFHX014
33	01/30/2022	Discount Firearms & Ammo	S&W, M&P 9 Shield Plus, 9, pistol, SN: JLL3320
34	02/08/2022	Sportsman's Warehouse #187 Henderson	1. Ruger, 10/22, .22, rifle, SN: 0020-53137 2. S&W, M&P 380 Shield EZ, .380, pistol, SN: REL3649
35	02/08/2022	Sportsman's Warehouse #222 Las Vegas	1. S&W, M&P 380 Shield EZ, .380, pistol, SN: REP2712
36	02/13/2022	C-A-L Ranch Stores	Rossi, RL22181WD, .22, rifle, SN: 7CL038065P
37	02/13/2022	Sportsman's Warehouse	1. CZ, 457, .22, rifle, SN: F201294 2. Glock, 42, .380, pistol, SN: AFWW011
38	02/13/2022	Bass Pro Shop	S&W, M&P 380 Shield EZ, .380, pistol, SN: RDV8027
39	02/13/2022	Precision Armory	1. ACP, M1911A1 FS-XT22, .22, pistol, SN: XTM021579 2. S&W, M&P 380 Shield EZ, .380, pistol, SN: RDX4835
40	02/20/2022	Discount Firearms & Ammo	Browning, Black Label 1911-380, .380, pistol, SN: 51HYZ03562

41	02/20/2022	Sportsman's Warehouse	S&W, M&P 380 Shield EZ, .380, Pistol, SN: RES1665
42	02/21/2022	Sportsman's Warehouse	S&W, M&P 380 Shield EZ, .380, pistol, SN: REP5263
43	02/23/2022	Grips by Larry	1. German Sports Guns, GSG-1911, .22, pistol, SN: B106609  2. German Sports Guns, GSG-1911, .22, pistol, SN: A913640  3. Browning, 1911-22, .22, pistol, SN: 51EYZ52718
44	03/02/2022	Sportsman's Warehouse	1. Umarex, Beretta M9, .22, pistol, SN: BM049849  2. Umarex, Beretta M9, .22, pistol, SN: BM051066  3. Umarex, Beretta M9, .22, pistol, SN: BM049605  4. Browning, Buckmark, .22, .22, SN: US515YY02799
45	03/09/2022	Sportsman's Warehouse	Keltec, PMR-30, .22, pistol, SN: WYAN18
46	03/09/2022	Sheepdog Armory	1. German Sports Guns (ATI), GSG-1911, .22, pistol, SN: A915663  2. Umarex, Beretta M9A1, .22, pistol, SN: BM050856
47	03/31/2022	Precision Armory	1. Umarex, Beretta 92FS, .22, pistol, SN: BM050711  2. Beretta, 92FS, 9, pistol, SN: A314848Z
48	03/31/2022	Ventura Munitions	1. Beretta, 84 BB, .380, pistol, SN: Y60678Y  2. Beretta, 84 BB, .380, pistol, SN: Y63047Y
49	04/07/2022	Ventura Munitions	Beretta, 84 BB, .380, pistol, SN: Y42356Y
50	04/09/2022	Spartan Arms	Glock, 44, .22, pistol, SN: AGGX015



51	04/09/2022	Sheepdog Armory	1. Taurus, TX22, .22, pistol, SN: 1PT491479 2. Chiappa Firearms, 1911-22, .22, pistol, SN: CFIT21D03178
52	04/09/2022	C-A-L Ranch Stores	Umarex, Beretta M9A1, .22, pistol, SN: BM058390
53	04/14/2022	Bass Pro Shop	Umarex, Beretta M9, .22, pistol, SN: BM058626
54	04/27/2022	C-A-L Ranch Stores	1. Rock Island, M1911 A1 XT, .22, pistol, XTM022182 2. Beretta, 92 FSR, .22, pistol, SN: BM056606
55	04/28/2022	Discount Firearms & Ammo	Glock, 44, .22, pistol, SN: AGRK874
56	04/28/2022	American Shooters	Kel-Tec, PMR 30, .22, pistol, SN: WY7K68
57	05/16/2022	Spartan Arms	1. Taurus, TX22, .22, pistol, SN: 1PT493594 2. Taurus, The Judge, .45/410, revolver, SN: ADC094467
58	05/16/2022	C-A-L Ranch Stores	1. S&W, M&P 15-22, .22, rifle, SN: LAE3659 2. Beretta, 92 FSR, .22, pistol, SN: BM056173
59	05/16/2022	Sheepdog Armory	Keltec, PMR-30, .22, pistol, SN: WY2L22
60	05/27/2022	Sportsman's Warehouse	1. Walther, Colt Gov. Model, .22, pistol, SN: WD073524 2. Umarex, HK 416D, .22, rifle, SN: HB062450
61	06/01/2022	American Shooters	Ruger, 57, 5.7x28, pistol, SN: 643-03695
62	06/01/2022	Ventura Munitions	FN, Five Seven, 5.7, pistol, SN: 386418464
63	06/26/2022	Bass Pro Shop	Browning, Black Label 1911-380, .380, pistol, SN: 51HYZ10620
64	06/26/2022	C-A-L Ranch Stores	Beretta, 92 FSR, .22, pistol, SN: BM056604

65	06/26/2022	Precision Armory	1. Glock, 44, .22, pistol, SN: AGTT642 2. Walther, Colt Rail Gun, .22, pistol, SN: WD072065
66	06/27/2022	Ventura Munitions	Palmetto State Armory, 5.7 Rock, 5.7x22, pistol, SN: RK004913
67	07/08/2022	C-A-L Ranch Stores	Taurus, TX 22, .22, pistol, SN: 1PT476174
68	07/09/2022	Bass Pro Shop	1. Glock, 44, .22, pistol, SN: AGRH165 2. Umarex, Beretta M9, .22, pistol, SN: BM001961
69	07/10/2022	Bass Pro Shop	Browning, Black Label 1911-380, .380, pistol, SN: 51HYY02074
70	07/10/2022	Precision Armory	Taurus, TX22, .22, pistol, SN: 1PT520919
71	08/06/2022	Spartan Arms	Walther, WMP, .22, pistol, SN: WT005111
72	08/06/2022	C-A-L Ranch Stores	1. German Sports Guns, GSG-1911, .22, pistol, A940524 2. German Sports Guns, GSG-1911, .22, pistol, A931202
73	08/07/2022	Spartan Arms	Walther, WMP, .22, pistol, SN: WT005114
74	08/08/2022	Ventura Munitions	Keltec, PMR 30, .22, pistol, SN: WYE545
75	08/21/2022	Precision Armory	Beretta, 92X, 9-millimeter, pistol, SN: 92X0061432
76	08/22/2022	Ventura Munitions	1. German Sports Guns, GSG-1911, .22, pistol, SN: A940249 2. Phoenix Arms, HP22, .22, pistol, SN: 4603131
77	09/25/2022	Precision Armory	Glock 44, .22 caliber pistol, SN: AGRL936
78	09/25/2022	Spartan Arms	1. Ruger, Mark IV, .22, pistol, SN: 500359340 2. Sig Sauer, P322, .22, pistol, SN: 73A018831



79	09/25/2022	Sheepdog Gun Armory	1. Glock, 44, .22, pistol, SN: AGVU670 2. Keltec, PMR-30, .22, pistol, SN: WX9494
80	09/25/2022	Discount Firearms & Ammo	Taurus, TX22, .22, pistol, SN: 1PT522186
81	10/05/2022	Ventura Munitions	1. Sig Sauer, P322, .22, pistol, SN: 73A038077 2. Taurus, TX22, .22, pistol, SN: 1PT572076
82	10/05/2022	C-A-L Ranch Stores	Taurus, TX22, .22, pistol, SN: 1PT534490
83	10/05/2022	Precision	Umarex .22 caliber pistol, SN: LR017680
84	10/27/2022	Ventura Munitions	1. Ruger, American, .22, rifle, SN: 836-08741 2. Beretta, M9-22, .22, pistol, SN: BM063394
85	10/28/2022	C-A-L Ranch Stores	Umarex, Beretta M9-22, .22, pistol, SN: BM062597
86	11/04/2022	C-A-L Ranch Stores	Sig Sauer, P322, .22, pistol, SN: 73A066447
87	11/20/2022	Spartan Arms	1. Glock, 44, .22, pistol, SN: AGXV710 2. Umarex, FN 502, .22, pistol, LR020429
88	11/20/2022	C-A-L Ranch Stores	1. German Sports Guns, GSG-1911, .22, pistol, SN: A947271 2. Taurus, TX22, .22, pistol, SN: 1PT507075 3. Sig Sauer, P322, .22, pistol, SN: 73A074339
89	11/20/2022	Sheepdog Armory	German Sports Guns, 1911 CA, .22, pistol, SN: A953390
90	12/05/2022	Ventura Munitions	1. German Sports Guns, Firefly, .22, pistol, SN: F483527 2. Keltec, PMR-30, .22, pistol, SN: WYHJ71

91	12/05/2022	Precision Armory	Keltec, PMR-30, .22, pistol, SN: WY0693
92	12/15/2022	Ventura Munitions	1. German Sports Guns, Firefly, .22, pistol, SN: F484596 2. Keltec, PMR-30, .22, pistol, SN: WYHJ57
93	12/15/2022	C-A-L Ranch Stores	Umarex, Beretta M9 22, .22, pistol, SN: BM062422
94	12/15/2022	American Shooters	Walther, PPK/S, .22, pistol, SN: WF074875
95	12/28/2022	Ventura Munitions	1. Beretta, 84BB, .380, pistol, SN: Y64213Y 2. Keltec, P17, .22, pistol, SN: GGR64
96	12/28/2022	C-A-L Ranch Stores	Keltec, PMR 30, .22, pistol, WY4530
97	12/28/2022	Spartan Arms	Taurus, TX22, .22, pistol, SN: 1PT548579
98	01/17/2023	C-A-L Ranch Stores	Ruger, Wrangler, .22, revolver, SN: 207-47098


All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

**DATED:** this 5<sup>th</sup> day of December, 2023.

**A TRUE BILL:**

/S/  
FOREPERSON OF THE GRAND JURY

JASON M. FRIERSON  
United States Attorney

  
DAVID KIEBLER  
Assistant United States Attorney